

FILED

APR 21 2021

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEMORION LITTLE,

Defendant.

4:21CR262 SEP/JMB

INDICTMENT

COUNT I

Beginning on a date unknown to the grand jury, but including on or about January 1, 2021, and continuing up to the date of this Indictment, with the exact dates unknown, within the Eastern District of Missouri,

DEMORION LITTLE,

the defendant herein, did knowingly and intentionally conspire, combine, confederate and agree, with other persons both known and unknown to the federal grand jury, to commit offenses against the United States, to wit: to knowingly and intentionally distribute and possess with the intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT II

The Grand Jury further charges that:

On or about February 25, 2021, in the City of St. Louis, State of Missouri, within the Eastern District of Missouri, the defendant,

DEMORION LITTLE,

the defendant herein, did knowingly and intentionally attempt to possess with the intent to distribute marijuana, a Schedule I controlled substance, and committed a substantial step in furtherance thereof,

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT III

The Grand Jury further charges that:

On or about February 25, 2021, in the City of St. Louis, State of Missouri, within the Eastern District of Missouri, the defendant,

DEMORION LITTLE,

the defendant herein, aided and abetted by others known and unknown, did knowingly possess, brandish and discharge one or more firearms in furtherance of the commission of a drug trafficking crime which may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to knowingly and intentionally possess with the intent to distribute marijuana, and attempt to possess with the intent to distribute marijuana as charged in Counts I and II herein.

In violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A).

And in the course of this violation caused the death of Rocoby Rodgers through the use of the firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, aiding and abetting others, with malice aforethought, unlawfully killed Rocoby Rodgers by shooting him with the firearm, willfully, deliberately, maliciously, and with premeditation, thereby making this offense punishable under Title 18, United States Code, Sections 2 and 924(j)(1).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) and 846, as set forth in Counts I and II, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

2. Subject to forfeiture upon a conviction of all applicable counts of the indictment is a sum of money equal to the total value of property, real or personal, constituting, or derived from, any proceeds obtained directly or indirectly as a result of such violation(s).

3. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 922 or 924 as set forth in this indictment, the defendant(s) shall forfeit to the United States of America any firearm or ammunition involved in or used or intended to be used in said offense.

4. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to Defendants' offenses.

5. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

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